

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

IN RE:

JOE JESSE MONGE and
ROSANA ELENA MONGE,

Debtors.

JOE JESSE MONGE and
ROSANA ELENA MONGE,

Plaintiffs,

V.

ALICIA ROJAS and FRANCISCO JAYME,

Defendants.

CASE NO. 09-30881-lmc

CHAPTER 11

ADVERSARY NO. 10-3019

JOINT STIPULATION FOR ENTRY OF ORDER TO EXTEND DEADLINES

TO THE HONORABLE H. CHRISTOPHER MOTT, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, JOE JESSE MONGE and ROSANA ELENA MONGE, Plaintiffs herein, jointed by ALICIA ROJAS and FRANCISCO JAYME (“Defendants”), Defendants herein, and file this their Joint Stipulation Extending all Deadlines and Moving for Continuance on the Docket Call for Trial, and as grounds therefore state:

1. The deadlines established in the above-captioned case provide that discovery be completed by 02/25/2011, that dispositive motions be filed by 02/02/2011, and that the pretrial order be submitted by 03/25/2011.

2. The parties have not been able to complete discovery and both Plaintiffs and Defendants believe that additional discovery will be beneficial. The parties, therefore, jointly stipulate that all of the deadlines in this case be extended for a period of ninety (90) days to allow for the parties to fully develop the facts and obtain documents, potentially from third parties. Such an extension of ninety (90) days will

require that the docket call for trial to be continued, and the parties, therefore, jointly move that the docket call for trial be continued to all for the said extension.

3. It is further agreed that this Stipulation is without prejudice to the rights of Plaintiffs or Defendants to seek additional extensions of the Deadlines in this case by and through another stipulation or further order of this Court and either parties' right to object thereto.

4. The undersigned parties agree that this Court shall retain jurisdiction to hear and determine all matters arising from or related to implementation of this Order.

WHEREFORE, Plaintiffs and Defendants request that the Court enter the Joint Stipulation extending all deadlines in this case.

DATED: February 18, 2011

GUEVARA, BAUMANN, COLDWELL
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DIAMOND LAW

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